

# **EXHIBIT B**

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**FILED**  
Superior Court of California  
County of Los Angeles  
05/27/2025  
David W. Staylor, Executive Officer / Clerk of Court  
By: R. Figlio Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

MINJIE ZHENG,  
Plaintiff,  
vs.  
INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS  
VERISIGN, INC.,  
BEIJING XINNET DIGITAL  
INFORMATION TECHNOLOGY CO.,  
LTD  
Defendants

Case No.: 25STLC04013  
COMPLAINT FOR:  
1. ANTITRUST VIOLATIONS  
2. DECLARATORY RELIEF  
3. BREACH OF CONTRACT  
4. UNFAIR BUSINESS  
PRACTICES

## **I. Plaintiff and Defendant Information**

1. Plaintiff Minjie Zheng is a Chinese citizen, pursuing an antitrust lawsuit regarding single-character .COM domain names.

2. Defendant INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS (ICANN) is a California nonprofit public benefit placeof, with its principal place of business at:

12025 Waterfront Drive, Suite 300 Los Angeles, California, USA

Phone: +1 310 301 5800 Fax: +1 310 823 8649

3. Defendant Defendant VeriSign, Inc. is a domain name registration management corporation, with its principal place of business at:

12061 Bluemont Way Reston, VA 20190 United States

Phone: +1 703-948-3200

4. Defendant Beijing Xinwang Digital Information Technology Co., Ltd. (Xinnet) is a domain name registration service provider, with its principal place of business at:

3rd Floor, Building B1, Digital Manor No.1 Disheng West Road

Beijing Economic and Technological Development Zone China

Phone: +86 10 5802 2233 Email: [bj@xinnet.com](mailto:bj@xinnet.com)

## **Ii. Court jurisdiction**

ICANN is a non-profit organization headquartered in Los Angeles, California, with jurisdiction in the Los Angeles Superior Court, see 23STCV19554.

Verisign is involved in ICANN's illegal activities. As a domain name registration agency, one should participate in litigation.

XINNET is a domain name registration service provider that has signed agreements with ICANN and Verisign. The plaintiff is a registered member of XINNET, which has signed agreements with both ICANN and Verisign, and therefore must participate in the lawsuit.

### 1 **Iii. Process**

2 1. In 1993, a technician from IANA retained 35 single character domain  
3 names, IANA later became an internal body of ICANN, However, two  
4 single-character COM domain names are registered

5 z.com Creation Date: 1997-12-19T05:00:00Z

6 q.com Creation Date: 1999-03-30T05:00:00Z

7  
8 2. November 10, 1999, ICANN entered into a domain name  
9 agreement with NSI (later acquired by Verisign), There are no  
10 reservations.

11 [https://www.icann.org/en/registry-agreements/multiple/icann-nsi-registry-](https://www.icann.org/en/registry-agreements/multiple/icann-nsi-registry-agreement-10-11-1999-en)  
12 [agreement-10-11-1999-en](https://www.icann.org/en/registry-agreements/multiple/icann-nsi-registry-agreement-10-11-1999-en)

13  
14 3. On May 25, 2001, CANN entered into a domain name agreement with  
15 Verisign, which contained a reservation clause in the text:3.8.1 Except to  
16 the extent that ICANN otherwise expressly authorizes in writing, Registry  
17 Operator shall reserve from registration the domain names specified by a  
18 schedule established by ICANN. The initial schedule is attached  
19 as **Appendix K**. Changes to the schedule may be made only with the  
20 mutual written consent of ICANN and Registry Operator (which neither  
21 party shall withhold without reason) or in the manner provided in  
22 Subsections 4.3 through 4.6. In fact, all the following domain names were  
23 registered, especially those marked with • marked, which were  
24 registered after the agreement.

25 Aso Aso.com Creation Date: 1998-01-05T05:00:00Z

26 Dnsso Dnsso.com Creation Date: 1999-01-17T05:00:00Z

27 Icanm Icanm.com Creation Date: 1998-09-14T04:00:00Z

28 Internic Internic.com Creation Date: 1997-06-06T04:00:00Z

Pso PSO.COM Creation Date: 1996-12-02T05:00:00Z

IANA-related names:

Afrinic ● AFRINIC.COM Creation Date: 2004-06-17T18:38:56Z

Apnic APNIC.COM Creation Date: 1997-01-04T05:00:00Z

Arin ARIN.COM Creation Date: 1996-09-12T04:00:00Z

Example EXAMPLE.COM Creation Date: 1995-08-14

Registrar: RESERVED-Internet Assigned Numbers Authority

gtld-servers:

Iab IAB.COM Creation Date: 1995-02-02T05:00:00Z

Iana IANA.COM Creation Date: 1996-07-29T04:00:00Z

iana-servers:

Iesg No match for domain "IESG.COM".

Ietf IETF.COM Creation Date: 2000-04-26T10:50:04Z

Irtf IRTF.COM Creation Date: 2000-06-06T11:48:54Z

Istf ISTF.COM Creation Date: 1999-12-18T21:27:30Z

Lacnic No match for domain "LACNIC.COM"..

Latnic LATNIC.COM Creation Date: 2000-02-06T01:08:24Z

Ripe RIPE.COM Creation Date: 1995-12-12T05:00:00Z

B. Additional Second-Level Reservations. In addition, the following names shall be reserved at the second level:

All single-character labels.

All two-character labels shall be initially reserved. The reservation of a two-character label string shall be released to the extent that the Registry Operator reaches agreement with the government and country-code manager, or the ISO 3166 maintenance agency, whichever appropriate. The Registry Operator may also propose release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes.

Note: All two-letter domain names have been registered.

1 In fact, all the domain names reserved by B have already been  
 2 registered, especially the two country codes that were registered after  
 3 May 25, 2001.

4 PL.COM • Creation Date: 2001-06-17 T10:31:19Z

5 CM.COM • Creation Date: 2015-01-16T19:52:55Z

6 Arpa .COM Creation Date: 1996-04-16T04:00:00Z

7 Biz..COM Creation Date: 1998-08-01T04:00:00Z

8 Com .com Creation Date: 1995-04-13T04:00:00Z

9 COOP.COM Creation Date: 1992-10-20T04:00:00Z

10 EDU.COM Creation Date: 1998-11-24T05:00:00Z

11 GOV.COM Creation Date: 1996-03-18T05:00:00Z

12 INFO.COM Creation Date: 1989-11-01T05:00:00Z

13 INT.COM Creation Date: 1993-05-19T04:00:00Z

14 MIL.COM Creation Date: 1997-10-24T04:00:00Z

15 MUSEUM.COM Creation Date: 1997-06-06T04:00:00Z

16 NAME.COM Creation Date: 1995-01-03T05:00:00Z

17 NET.COM Creation Date: 1989-05-08T04:00:00Z

18 ORG.COM Creation Date: 1997-11-03T05:00:00Z

19 PRO.COM Creation Date: 1994-02-21T05:00:00Z

20 C. Tagged Domain Names. All labels with hyphens in the third and fourth character

21 D. Second-Level Reservations for Registry Operations. The following names are  
 22 reserved for use in connection with the operation of the registry for the Registry TLD.

23 They may be used by Registry Operator under Subsection 24(A), but upon conclusion of  
 24 Registry Operator's designation as operator of the registry for the Registry TLD they  
 25 shall be transferred as specified by ICANN:

26 Nic NIC.COM Creation Date: 1994-02-07T05:00:00Z

27 Whois WHOIS.COM Creation Date: 1995-04-11T04:00:00Z

28 www No match found for a com

1 4. This list of attachments that are not inverted

2 According to the normal format of the agreement, the names of the  
3 attachments and appendices are written in the body of the agreement,  
4 and due to ICANN's cunning, it has made a list of attachments in an  
5 attempt to qualify the retention of single and two characters.

6  
7 5. October 16, 2007 ICANN Establishes Forum on Allocation Methods for  
8 Single-Letter and Single-Digit Domain Name

9 [https://www.icann.org/en/announcements/details/icann-establishes-forum-](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)  
10 [on- allocation-methods-for-single-letter-and-single-digit-domain-names-16-](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)  
11 [10-2007-en](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)

12  
13 6. ICANN Seeks Expressions of Interest from Auction Design Experts

14 [https://www.icann.org/en/announcements/details/icann-seeks-expressions-](https://www.icann.org/en/announcements/details/icann-seeks-expressions-of-interest-from-auction-design-experts-18-1-2008-en)  
15 [of- interest-from-auction-design-experts-18-1-2008-en](https://www.icann.org/en/announcements/details/icann-seeks-expressions-of-interest-from-auction-design-experts-18-1-2008-en)

16 ICANN is seeking expressions of interest from entities experienced in  
17 developing and managing auction processes. ICANN has identified several  
18 areas where auctions might be an appropriate tool, such as the efficient  
19 disposition of data from terminated registrars and registries, the allocation  
20 of single-character second-level domain names, and perhaps, resolution of  
21 contention between competing commercial applicants for identical strings  
22 in the application process for new generic Top Level Domains.

23 A number of commenters and academics have recommended auctions as the  
24 preferred method of objectively allocating scarce resources such as  
25 popular second-level domain names or gTLD strings. Also, ICANN  
26 received substantial public comment in the discussion on allocation of  
27 single-character second-level names that the names should be allocated  
28 through an auction model.

## 7. Single-Character Second-Level Domain Name (SC SLD) Allocation Framework

<https://www.icann.org/en/contracted-parties/consensus-policies/registry-services-evaluation-policy/single-character-second-level-domain-name-sc-sld-allocation-framework-13-06-2008-en>

8. On August 12, 2008, the plaintiff filed an anti-monopoly lawsuit with Xinnet for the registration of 33 single-word COM, the case number is 2011 Zhening Zhichu Zi No. 35. Xinnet refused to register 33 domain names. The reason is that the defendant kept it

The Intermediate People's Court of Ningbo accepted this case. ICANN claims that due to technical reasons, these domain names were retained in 1993 and should be determined by US courts. The Ningbo Intermediate People's Court supports ICANN's jurisdictional claim and rejects the plaintiff's lawsuit.

9. In April 2013, ICANN stated at its 46th meeting in Beijing that the single character domain name registration proposed by Zheng Minjie no longer has technical reasons, and our independent prosecutor will receive you. The independent prosecutor sent an email stating that there are no restrictions on the registration of these domains and recommended registering them with Verisign.

10. Since April 2013, the ICANN Global Support Center has repeatedly responded that registering a single character COM domain name does not require authorization from ICANN, but is registered by Verisign.

11. The plaintiff applied to Xinwang Company with ICANN's response, and on May 7, 2013, Verisign conveyed through Beijing Xinwang Company



1 that single character and two character domain names are reserved by  
2 ICANN.

3  
4 12 January 6, 2015 the plaintiff's application for CM.COM was rejected and  
5 was registered by someone else a week later.

6  
7 13. In 2017, the plaintiff filed a lawsuit with the anti-monopoly department  
8 of the People's Republic of China, accusing Verisign of abusing its market  
9 dominance by refusing to register single character and CM.COM domain  
10 names.

11 The antitrust department launched an investigation on November 23, 2017,  
12 and Verisign provided the antitrust department with a judgment from a US  
13 federal court stating that CM.COM was registered by someone else due to  
14 the US court's ruling.

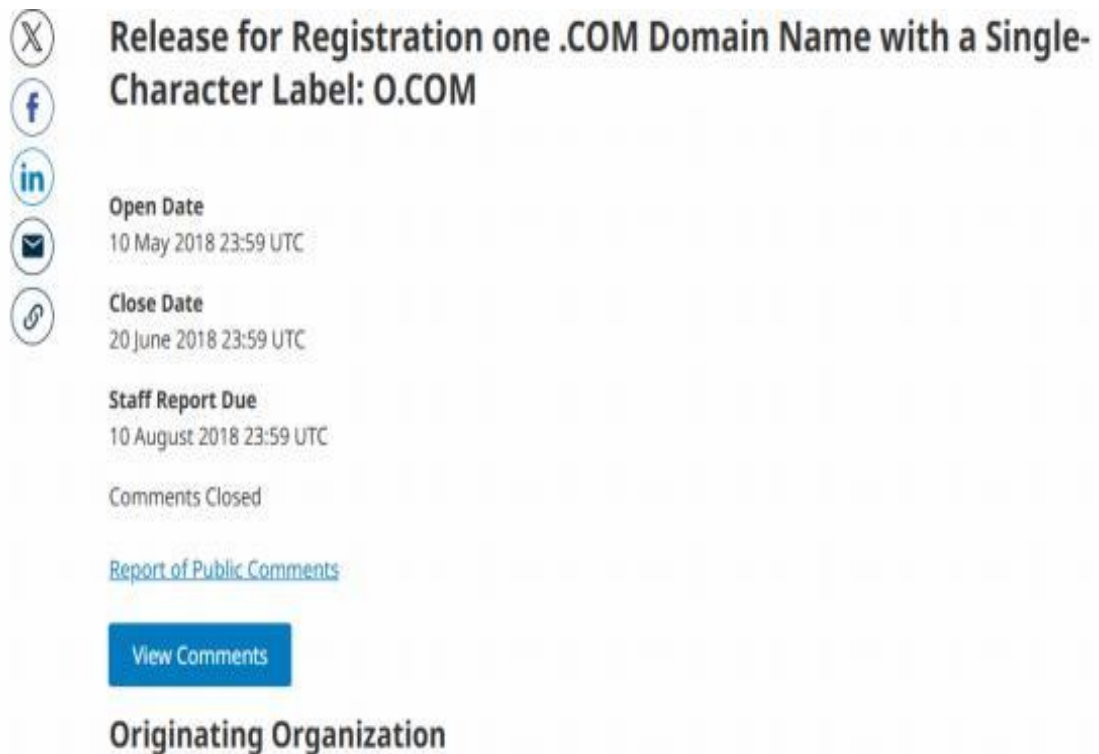
15  
16 14. On November 30, 2017, Verisign reported to ICANN that it wanted to  
17 auction off these domain names, but concealed the fact that they were under  
18 investigation.

19  
20 15. On December 7, 2017, ICANN announced that opening up the  
21 registration of these domain names would not jeopardize network security,  
22 but the auction would require approval from the US antitrust department.  
23 The auction application has been submitted to the US Department of Justice,  
24 but ICANN concealed the fact that the Chinese antitrust agency is  
25 investigating. Its purpose is to use the response of the US government to  
26 counter the Chinese government. But I didn't expect the antitrust  
27 department of the US Department of Justice to reject the application.

16. On December 14, 2017, the US Department of Justice did not accept auction applications

17. On January 8, 2018, Verisign defended to the Chinese antitrust agency that these domain names were no longer reserved and were ready for auction, but concealed the fact that the US antitrust agency did not accept the auction

18. <https://www.icann.org/en/public-comment/proceeding/release-for-registration-one-com-domain-name-with-a-single-character-label-ocom-10-05-2018> (Due to too many people cursing, he closed his mailing list)



The screenshot shows a public comment page titled "Release for Registration one .COM Domain Name with a Single-Character Label: O.COM". It includes social media sharing icons for X, Facebook, LinkedIn, Email, and a link icon. Key dates listed are: Open Date (10 May 2018 23:59 UTC), Close Date (20 June 2018 23:59 UTC), and Staff Report Due (10 August 2018 23:59 UTC). The page also indicates "Comments Closed" and provides a link to "Report of Public Comments" and a "View Comments" button. The "Originating Organization" field is present but empty.

19.. Comments of the American Internet Chamber of Commerce , This opinion was downloaded before ICANN closed the list, stating that these domain names are not owned by Verisign and have no right to be auctioned. Doubting auction donations as a covert operation in these opinions.

1  
2 20. March 27, 2019 ICANN Modify Registration Agreement

3 <https://itp.cdn.icann.org/en/files/registry-agreements/com/com-amend-2-pdf>  
4 - 27mar19-en.pdf

5 All single-character labels. Notwithstanding this reservation the single  
6 character label o.com may be released pursuant to the o.com Service

7 Note the last one, read that right:: Exhibit A – CONFIDENTIAL To  
8 Schedule 1 to Appendix 7 (o.com Service Description) [REDACTED FOR  
9 CONFIDENTIALITY]

10  
11 21. On February 25, 2020, the Chinese anti-monopoly department issued an  
12 administrative penalty decision against Verisign;

13  
14 22. On April 13, 2025, the plaintiff filed a complaint with ICANN,  
15 accusing Verisign of illegally refusing domain name registration. On  
16 April 21, 2025,  
17 ICANN responded that the ICANN Contract Compliance Department  
18 will resolve this issue within 3-5 working days after receiving a new  
19 complaint. If you do not receive a response from them within 5 working  
20 days, you can send an email to [compliance@icann.org](mailto:compliance@icann.org) Query status.

21  
22 23. On April 22, 2025, the plaintiff sent an email stating that the complaint  
23 had exceeded the 6 \* 24 hour limit. I would like to know if you have  
24 notified Verisign. ICANN shall not violate its own regulations; Otherwise,  
25 CANN will lose its basic reputation. If there is no response, I will initiate  
26 the review process. These matters will become evidence in administrative  
27 procedures and civil litigation.

23. . On April 23, 2025, an email was sent to the ICANN Complaints Office and ICANN Complaints Commissioner Krista Papac. hen facing the public and individuals, your behavior should be consistent.

25. On April 25, 2025, an email was sent to ICANN requesting a response from the Contract Compliance Department regarding the progress of the complaint against VeriSign. ICANN has not responded.

26. On April 29, 2025, the plaintiff applied again to Beijing Xinwang Digital Information Technology Co., Ltd. to register these domain names and attached a US judgment, but did not receive a response.

27. US Lawmakers Demand Federal Probe into VeriSign's .com Pricing Practices <https://greyjournal.net/news/us-investigation-verisign-com-pricing>  
**Elizabeth Warren asks for investigation of Verisign**

**<https://domainnamewire.com/2024/11/27/elizabeth-warren-asks-for-investigation-of-verisign/>**

28. Someone in the United States is already suing ICANN for single character domain names, see 23STCV19554

#### **IV. Analyze the facts formed by the above evidence**

1. On 10 October 2007, Danny Younge revealed at the ICANN Auction Forum that the reservation of these domain names was an arbitrary act of the individual and that ICANN's actions were hypocritical. Danny Young, a third party unrelated to the plaintiff, testified that there was no discussion of reserving a single-character domain name;

1 2. There was no reservation in 1999, the reservation of the body of the  
2 agreement in 2001 does not involve single-character and two-character  
3 domain names, and the Annex K claimed by ICANN is not related to  
4 the body of the agreement, and 99% of the "B:Additional" in Annex K  
5 has been registered so far, and the registration process has not been  
6 authorized by ICANN, nor has the agreement been amended, and the  
7 Additional is not justified. Therefore, the refusal to register of the  
8 remaining 1% is an abuse of market dominance.  
9

10 3. ICANN's reply in the Ningbo Intermediate People's Court asserted  
11 that it was retained for technical reasons, and if it was retained for other  
12 reasons, it should be listed in Annex K for other reasons, not  
13 B:Additional. Therefore, ICANN is misrepresentation. 3. At the 46th  
14 meeting held in Beijing in 2014, ICANN explicitly announced that single  
15 character COM domain registration no longer poses a security risk, and  
16 prosecutors have sent emails stating that these limiting factors no longer  
17 exist. You can contact Verisign for registration;  
18

19 4. ICANN Global Service Center email statement: Registering a single  
20 character COM does not require ICANN authorization, please contact  
21 Verisign directly;

22 The independent prosecutor said there were no restrictions on the  
23 registration of these domain names and recommended that they be  
24 registered at Verisign. This is the consensus of ICANN's staff and the  
25 ability to prove the truth.

26 The response from ICANN's Global Service Center, along with that  
27 from the Independent Prosecutor, has the ability to prove the truth.  
28

1 5. Opinions of the American Internet Chamber of Commerce on the 2018  
2 Verisign auction: these domain names do not belong to Verisign, and  
3 Verisign has no right to auction;  
4

5 6. Verisign's response that it was reserved by ICANN was not wrong,  
6 but it was an illegal reservation. Once U.S. antitrust authorities impose  
7 a \$100 million fine or pursue criminal liability, the two companies will  
8 begin to pass the buck to each other. However, since it is reserved by  
9 ICANN, Verisign does not have the authority to request an opening and  
10 auction in 2018.  
11

12 7. The administrative penalties from China's antitrust agencies and the  
13 rulings of U.S. federal courts prove that retaining and auctioning these  
14 domain names is illegal;  
15

16 8. Nearly all of the domain names in Table K are registered without  
17 authorization from ICANN. If these domain names are legally reserved,  
18 they should be canceled in their entirety, including the CM.COM as  
19 determined by 14-CV-01999-TPG  
20

21 9. The fact that the domain names that were reserved in Addition in  
22 Table K in 2001 were not available in Table K in 2012 proves that there  
23 is no justification for the additional.  
24

25 10. ICANN's failure to respond to complaints about Verisign's illegal  
26 refusal to register single letter domain names proves that these reservations  
27 have no legal basis;  
28

1 11. ICANN prepared for auction in 2007, and then Verisign prepared for  
2 auction in 2018. This indicates that these domain names do not have owners.  
3 Single-letter and two-letter domain names have never been retained in  
4 the body of the agreement, so the 2019 amendment agreement on  
5 open O.COM has no basic basis.

6  
7 12. The inclusion of single-letter and two-letter domain names on the  
8 restricted list is a serious threat to existing holders;

9  
10 .13. In all previous agreements, the terms of the domain name  
11 registration are as follows:  
12 (a) the principle of allocating registered domain names in the TLD (e.g.,  
13 first-come, first-served, timely renewal, post-expiration retention period);  
14 (b) prohibit registries or registrars from storing or speculating on  
15 domain names;  
16 (c) reserve registered domain names in the TLD that may not have  
17 been initially registered, or cannot be renewed for reasonable reasons  
18 of: (a) avoiding user confusion or misleading users, (b) intellectual  
19 property rights, or (c) the technical administration of the DNS or the  
20 Internet (e.g., establishing a name reservation from registration);  
21 It is clear that the separate Appendix K is an illegal reservation.

22  
23 14.2001-2012 – Appendix K b: Other Reserved Domain Names. • All  
24 single-character markers. • Two-character labels should be kept  
25 initially. The reservation of the two-character label string should be  
26 removed after the registration authority has reached an agreement with  
27 the government and country code management agency or ISO 3166  
28 maintenance agency, as applicable.



1 15. For the first time, the body of the 2024 Agreement appears (i)  
2 registration restrictions. The Registry Operator shall retain and not  
3 register any TLD strings that appear in the list of reserved TLD strings  
4 attached to Annex 6 of this Agreement in 2012. This is equivalent to  
5 declaring all other registered reserved domain names illegal. If the  
6 court does not revoke this qualifying clause, the plaintiff files a lawsuit  
7 for the domain name in Form K.

## 8 9 **V conclusion**

10 1. ICANN and Verisign violated the prohibition on direct selling and  
11 hoarding of domain names by retaining these domain names without a  
12 valid reason and preparing to sell them at a high price, especially after  
13 the administrative penalties and court rulings of the Chinese antitrust  
14 authorities, which is a subjective and deliberate abuse of their dominant  
15 market position. There are no single- and two-character domain names  
16 reserved in the body of all agreements prior to 2024, and all reserved  
17 domain names in Table K, with the exception of 33 single-character  
18 domain names, have been registered without authorization, which  
19 proves that there are no legitimate reservations.

20 2. The 2019 Revised Agreement between ICANN and Verisign  
21 classifies the O.COM Auction as confidential. Under U.S. antitrust law,  
22 it is a conspiracy to collude to monopolize and is automatically  
23 considered illegal under any circumstances. Such acts will be dealt with  
24 harshly and may result in imprisonment.

### 25 Exhibit A – CONFIDENTIAL

26  
27 To Schedule 1 to Appendix 7 (o.com Service Description)

28 [REDACTED FOR CONFIDENTIALITY]



1 In summary, the two defendants seriously violated the Antitrust Law  
2 and ICANN's own regulations.

### 3 4 **VI.WHEREFORE,plaintiffpraysforjudgement**

- 5 1.Confirm the provisions of the COM Registry Agreement signed by  
6 ICANN and VeriSign on December 1, 2024, which retain and prohibit  
7 Registering single character and two character Domain name listed in  
8 Appendix 6 of this agreement is illegal.  
9 2.Confirm that 33 domain names do not have owners.  
10 3.Order the defendant to register 33 domain names for the plaintiff  
11 4.Compensate the plaintiff for reasonable expenses and mental damages  
12 incurred in the 16 year lawsuit, totaling 35000  
13 5.The litigation costs and reasonable expenses of this case shall be borne by  
14 the three defendants;

### 15 16 **vii Request the jury to participate in the trial**

17 US Lawmakers Demand Federal Probe into VeriSign's .com Pricing  
18 Practices <https://greyjournal.net/news/us-investigation-verisign-com-pricing>  
19 Elizabeth Warren asks for investigation of Verisign  
20 [https://domainnamewire.com/2024/11/27/elizabeth-warren-asks-for-](https://domainnamewire.com/2024/11/27/elizabeth-warren-asks-for-investigation-of-verisign)  
21 [investigation-of-verisign](https://domainnamewire.com/2024/11/27/elizabeth-warren-asks-for-investigation-of-verisign)

22 We are preparing to get in touch with Elizabeth Warren to catch her  
23 attention.

24  
25 2025-05-17



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28 CA94403.

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